

or a non-edge pixel". Final Office Action, page 4. Instead, as admitted by the Office Action, Acharya merely determines whether a pixel is an edge or non-edge pixel, and not "identifying noise in a first portion of the video frame."

Further, Acharya does not disclose a method in which "replacing the first portion with a second portion of the video frame" occurs, also recited by claim 1. In this regard, Applicants respectfully disagree that the above-recited element is met by the linear averaging technique disclosed in Acharya Final Office Action, pp. 2, 4. As disclosed in Acharya, such a technique averages neighboring pixels and the pixel under consideration to obtain an average of the pixels. It is then this average of the pixels that replaces the original pixel. Acharya, col. 11, ln. 29 to col. 13, ln. 3. Such an average is not "a second portion of the video frame" as recited by claim 1. Thus, claim 1 and claims 2 through 5 depending therefrom patentably distinguish over Acharya.

Dependent claim 2 is further patentable over Acharya as Acharya does not disclose "associating a noise level with the first portion of the video frame" and "comparing the noise level to a predetermined value." In this regard, determining a gradient value for each pixel is not "associating a noise level" with a portion of the video frame. More so, comparing gradient information to a threshold is not "comparing the noise level to a predetermined value." Accordingly, claim 2 patentably distinguishes over Acharya for this additional reason.

For similar reasons as discussed above as to claim 1, claim 9 is patentable over Acharya, as nowhere does Acharya disclose a system having a software program that "replaces the first portion of the video frame with a second portion of the video

frame," as recited by claim 9. In this regard, the portion of the specification relied upon by the Office Action, namely col. 13, ln. 45, through col. 14, ln. 60, does not disclose, at least, a storage medium that includes a software program that, upon execution "replaces a first portion of the video frame with a second portion of the video frame," as discussed above. Thus, claim 9 and claims 10 through 12 depending therefrom are patentable over Acharya.

With regard to claim 10, claim 10 further is patentable over Acharya as nowhere does Acharya disclose a "software program [that] writes to the memory to replace the first portion of the video frame." Instead Acharya discloses that the resulting average value (i.e., not a second portion of the video frame) is stored into an array or table "so that the original value  $x(i, j)$  is not overwritten...." Acharya col. 12, lns. 60-64. Thus for this further reason, claim 10 is patentable over Acharya. Claim 11 patentably distinguishes over Acharya for the further reason discussed above regarding claim 2.

For the same reasons discussed above regarding claim 1, claim 16 and claims 17 through 20 and 22 depending therefrom are patentable over Acharya. Further, for the same reasons discussed above regarding claim 2, dependent claim 18 further patentably distinguishes over Acharya.

Claim 25 is also patentable over Acharya, as nowhere does it disclose "replacing the first portion of the video frame with one of the second portion, the first adjacent portion or the second adjacent portion if a comparison between the first result and the second result is indicative of noise" as recited by claim 25. In this regard, replacing a pixel under consideration with a linear average of the pixel and neighboring pixels does

not meet this element. See Final Office Action, pp. 7-8. That is, such an averaging technique does not replace a first portion of a video frame with one of a second portion, a first adjacent portion, or a second adjacent portion, all of which are original portions of the video frame and not an average value. For at least this reason, claim 25 and dependent claims 26-30 are patentable over Acharya.

Dependent claim 27 is further patentable as nowhere does Acharya disclose "calculating a first threshold based on an amount of the plurality of units per the respective portion." In this regard, the portion of Acharya cited by the Office Action (namely col. 4, ln. 66 through col. 5, ln. 10) merely states that the threshold value may be selected as a single value or may vary. However nowhere does this or any other portion of Acharya disclose that the threshold is based upon an amount of the plurality of units per the respective portion. For this further reason claim 27 is patentable over Acharya.

With regard to dependent claim 28, nowhere does Acharya disclose that the first and second results "comprise a sum of absolute differences." For at least this additional reason, claim 28 patentably distinguishes over Acharya.

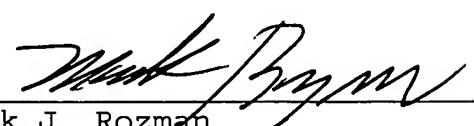
#### B. Allowable Subject Matter

Applicants gratefully acknowledge the indication that claims 6-8, 13-14, 21 and 23-24 would be allowable if rewritten in independent form. Applicants respectfully submit in light of the above remarks that the independent and intervening claims are also patentable and accordingly respectfully submit dependent claim 6-8, 13-14, 21 and 23-24 are also patentable in their present form.

In view of these remarks, the application is now in condition for allowance and the Examiner's prompt action in accordance therewith is respectfully requested. The Commissioner is authorized to charge any additional fees or credit any overpayment to Deposit Account No. 20-1504.

Respectfully submitted,

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